Case 1:21-mc-00425-JPO Document 17 Filed 05/20/21 Page 1 of 1



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

May 14, 2021

BY EMAIL

The Honorable J. Paul Oetken United States District Judge Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, New York 10007

Re: In re Search Warrants dated April 21, 2021, and April 28, 2021, 21-MC-425(JPO)

Dear Judge Oetken:

The Government writes with respect to the sealing and partial redaction of the letter briefs filed by counsel for Ms. Toensing and Mr. Giuliani on May 12, 2021, as well as the Government's April 29, 2021 letter. The Government has conferred with counsel for Ms. Toensing and Mr. Giuliani, and the parties have agreed upon the redactions enclosed in the attached documents. The redactions are narrowly tailored to protect the Government's ongoing grand jury investigation and third party privacy interests by redacting specific information related to the applicable warrants, while permitting very general information about the warrants to be unredacted. Accordingly, the parties respectfully request that the attached partially redacted letter briefs be filed with the Court's approval.

Respectfully submitted,

AUDREY STRAUSS United States Attorney for the Southern District of New York

By: ____/s/___ Rebekah Donaleski Nicolas Roos Aline R. Flodr Assistant United States Attorneys (212) 637-2423/ 2421/ 1110

Cc: Robert Costello, Esq. (counsel for Rudolph Giuliani)
Michael Bowe, Esq. / E. Patrick Gilman, Esq. (counsel for Victoria Toensing)